



IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION

JOHN DOE #1 (JDR),

Plaintiff,

vs.

WILLIAM B. LEE, Governor of the State
of Tennessee, and DAVID B. RAUSCH,
Director of the Tennessee Bureau of
Investigation, in their official capacities,

Defendants.

Case No. 3:23-cv-0651

PLAINTIFFS' MOTION TO PROCEED UNDER PSEUDONYM
AND FOR PROTECTIVE ORDER

Plaintiffs hereby move the Court for permission to proceed in this action under the pseudonyms "John Doe" and to enter a protective order barring the disclosure of Plaintiffs' true name or other information that identifies Plaintiff or Plaintiff's family members, directly or indirectly, and requiring that any documents containing such information be redacted or filed under seal.

In support of this motion, Plaintiffs relies upon Plaintiffs' supporting memorandum and the entire record in this case and states:

1. Courts "may excuse plaintiffs from identifying themselves in certain circumstances" where "a plaintiff's privacy interests substantially outweigh the presumption of open judicial proceedings." *Doe v. Porter*, 370 F.3d 558, 560 (6th Cir. 2004).

2. Fed. R. Civ. Proc. 26(c) authorizes the Court to "make any order which justice requires to protect the party or person from annoyance, embarrassment, oppression, or undue burden or expense" upon motion of a party.